



Pillsbury Winthrop Shaw Pittman LLP
Four Embarcadero Center, 22nd Floor | San Francisco, CA 94111-5998 | tel 415.983.1000 | fax 415.983.1200
MAILING ADDRESS : P.O. Box 2824, San Francisco, CA 94126-2824 | San Francisco, CA 94111-5998

Kenneth E. Keller
tel: 415.983.1084
kenneth.keller@pillsburylaw.com

December 22, 2020

VIA ECF

The Honorable Robert M. Levy
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: AirWair International Ltd. v. Primark US Corp. and Primark Ltd.
Case No.: 1:19-cv-06189-LDH-RML

Dear Magistrate Judge Levy:

AirWair submits this letter and the accompanying declaration of Anne Marie Verschuur, Dutch counsel for AirWair in the Dutch proceedings with Primark that the parties have discussed with the court. This letter supplements AirWair's letter of December 18, 2020 (Dkt. 31) requesting that the court enter a confidentiality order so that the parties can exchange confidential documents and, if necessary, AirWair can seek the court's order to allow use of such documents in the Dutch proceedings.

Respectfully submitted,

/s/ Kenneth E. Keller
Kenneth E. Keller

Attorneys for Plaintiff AIRWAIR INT'L LTD.

Attachment – Declaration

cc: All Counsel of Record (via ECF)